UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERM COMMODITIES COTTON :   Master Docket
                                            :   No. 12-cv-5126 (ALC) (KNF)

FUTURES LITIGATION   :

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This Document Relates To: All Actions   :

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MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

1.   The Stipulated Protective Order entered by the Court on April 30, 2014 (ECF No. 106) governs the management of information produced in this action that is designated "Confidential" or "Highly Confidential."

2.   The Stipulated Protective Order, and Section 7.C. of this Court's Individual Practices, requires a party seeking to file "Confidential" or "Highly Confidential" information under seal to first obtain leave of Court. Requests for sealing are required to include proposed redactions to the sealed materials.

3.   Pursuant to the Stipulated Protective Order, the parties and certain non-parties have designated materials produced in discovery and deposition testimony given in this action as "Confidential" or "Highly Confidential" pursuant to the Protective Order.

4.   Plaintiff has prepared a letter to The Honorable Andrew L. Carter, Jr. dated December 15, 2016. Plaintiff's letter and Appendix references and/or quotes documents and/or deposition testimony that have been designated "Confidential" or "Highly Confidential."

5.   Plaintiff is e-mailing a complete un-redacted version of his December 15, 2016 letter submission (including the accompanying un-redacted Appendix) to Chambers and counsel

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for Defendants. Plaintiff's proposed redactions to his December 15, 2016 letter submission are

attached as Exhibit A hereto.

6.   Accordingly, Plaintiff respectfully requests that the Court authorize Plaintiff to

file his December 15, 2016 letter submission under seal.

Dated: New York, New York
          December 15, 2016

                                                    Respectfully submitted,

                                                    **LOVELL STEWART HALEBIAN
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